

Minutes for Rule 21 Working Group Meeting #69
August 24, 2005
California Energy Commission
Oakland, CA (Courtesy of PG&E)

Scott Tomashefsky, Chair

Attendees:

Aldredge, Pat	SCE
Blumer, Werner	CPUC
Chang, Sam	PG&E
Dixon, John	SDG&E
Goh, Jeff	PG&E
Iammarino, Mike	SDB&E
Jackson, Jerry	PG&E
Jolivet, Renee	PG&E
Lacy, Scott	SCE
Larsen, Eric	RCM
Luke, Robin	RealEnergy
Mazur, Mike	3 Phases
McAuley, Art	PG&E
Mehta, Heather	MRW & Assoc
Michel, David	CEC
Parks, Ken	SDG&E
Prabhu, Edan	Reflective
Quiroz, Ed	CPUC/ORCA
Sheriff, Nora	CAC/EPUC
Smith, Richard	SDG&E
Tongsopit, Jiab	UCSC
Torribio, Gerry	SCE
Tunnicliff, Dan	SCE
Vaziri, Mohammad	PG&E
Walter, Stacy	PG&E
Whitaker, Chuck	BEW

Several others joined the meeting part time or took part in the festivities. It was a special day.

Combined Meeting

1. The meeting was called to order by departing chair Scott Tomashefsky. Scott was the force behind the Working Group, nurturing it through its formative years through meeting no. 69. The Rule 21 Working Group is now a body that is recognized and accepted as an effective tool in achieving resolution and aiding policymaking relative to DG and to interconnection. Indeed, it has expanded beyond its roots as a means of achieving interconnection to where it has been requested to provide advice on tariff, dispute resolution and other issues. Scott, congratulations on an excellent job these last several years. The Working Group owes you a huge debt of gratitude. We will do our best to maintain the high standard you set, building trust and resolving issues and with dignity and mutual respect.
2. The next Process Group meeting (70A) will be held at PG&E's offices in **SAN FRANCISCO** on Tuesday September 13. The next Technical Group meeting (70B) will be two days long, held in San Diego on Monday September 26, and Tuesday September 27.
3. The DG OIR (R.04-03-017) Decision No. D 0508013 is on the CPUC Commission meeting consent calendar for August 25 (At the meeting, the decision was approved unanimously. The next Process Group meeting will focus exclusively on the Working Group actions required by the decision.
4. There was no discussion on the issues raised by the Energy Policy Act of 2005.
5. It was generally agreed that a White Paper prepared by the Working Group suggesting R&D work to aid Interconnection would be useful to the CEC's PIER Program. It was suggested that perhaps the CEC could, at a future date, present its current PIER R&D Program activities to the Working Group, perhaps at the next Sacramento meeting. Dave Michel will pursue this recommendation.
6. With Scott Tomashefsky leaving the CEC, Edan Prabhu will fill in to lead the Working Group coordinator until the CEC decides on Scott's replacement.
7. The Action Items Matrix will be reviewed in detail when the actions called for by the decision are well under way. Several existing action items will be superseded by those required by the decision.

Process Breakout

1. Most of the afternoon was devoted to evaluating the proposed decision, how it may change, whether it provided sufficient clarity to move forward with the changes it required, and whether the required dates could be met.
2. The filing deadline for Advice Letters in the draft decision was December 1, 2005. Thanks to Scott Tomashefsky's request, the final decision has a filing date of six months, which means February 25, 2006. This is a tall order, and needs an aggressive effort to meet the deadline.
3. It was anticipated that four Process Group meetings would be needed to develop the needed changes, followed by at least a month for the utilities to prepare advice letters. It may be necessary for one of the four meetings to be two days long. These issues will be addressed at the upcoming process group meeting in San Francisco.

Technical Breakout

Greg Ball	PowerLight
John Dixon	SDG&E
Scott Lacy	SCE

Pauline Tapia	PG&E
Jiab Tongsopit	UCSC Grad Student
Mohammad Vaziri	PG&E
Chuck Whitaker	BEW Engineering

1. **Next Meeting:** In order to address the requirements of the recent CPUC and ALJ decisions, the process and tech breakouts will be meeting separately for the next two months (September and October). Rather than two separate monthly meetings, we will hold a two-day tech. only meeting, September 26 and 27 in San Diego. We have generally found periodic 2-day meetings to be very effective as we can not only begin tech work first thing in the morning but also work later, at least on the first day. Details will be posted on the Rule 21 web site as they become available.
2. Reviewed the Action Item list (to which the eight individual Network Interconnection tasks has now been added).
3. **T131 – Transfer Trip:** No additional comments were received on T131, Transfer Trip. Bill Cook’s final write-up will be added to the Supplemental Review Guideline as Annex B and posted on the Energy Commission web site.
4. **T138 – Certification/1547.1 Implementation:** No comments have been received on the draft document comparing Rule 21 and 1547.1 language. The group discussed the implementation options that range from replacing large amounts of text with a few references to 1547.1 and UL 1741 to adding and revising existing text to address the new standard. It seems reasonable that the certification requirements (type and production testing) will lean towards the former approach (simple reference, less verbose) while the commissioning and periodic testing may lean towards the latter approach. Members are requested to review the draft (“T1381547.1vRule212005-07-11.doc” can be found under the Tech heading “IEEE 1547.1 at www.rule21.ca.gov) and forward comments.
5. The combined session reviewed the issue of the existing Rule 21 certification “effective date”—the date by which equipment certified under the original Rule 21 requirements must be re-evaluated to the new 1547-based requirements. Equipment not re-evaluated will be removed from the certified equipment list and will be ineligible to meet the certified equipment requirement after that date.
6. Current language (last paragraph of Section J.1) lists an effective date of Dec 31, 2005. Replacement language was proposed that would tie the effective date to the implementation of UL 1741, which forms the basis of the certification process and which is currently being revised to address the new IEEE 1547 and 1547.1 requirements. The primary issue is that the revised 1741 has not been approved, and if for some reason its scheduled mid-September publication date slips significantly, there would either be insufficient time for any new language to be approved by the CPUC or we would have to impose dates that could differ from those in 1741 creating a period of confusion when one standard takes effect and the other doesn’t.

7. The proposed language change will be circulated to the full working group, noting that a decision will have to be made at the October meeting. Note that this effective date change is independent of the 1547.1 implementation, which we expect will take 3 or 4 months to complete.
8. **T134 – Network Interconnection:** Dave Brown was unavailable for this meeting so had no input on the list/description of Networks in CA. In a phone conversation before the meeting, Dave did mention that he had obtained confirmation from LADWP that they have no secondary networks. In reviewing the other topics, we discussed the known sources of information.
9. Moh Vaziri forwarded PG&E's "Trailblazer" requirements for simplified interconnection to area networks (posted in the Network Interconnection area of www.rule21.ca.gov). Moh stressed that these are preliminary and subject to further review, but did want to share the document with the group and get feedback. There are four basic criteria that an applicant must meet to be considered for simplified interconnection:
 10. Aggregate DR on the Area Network must be less than 2% of the Network minimum load
 11. Applicant DR must be less than or equal to 10% of the customer verifiable minimum load during DR operation
 12. Applicant DR must be 11 kVA or less
 13. Applicant DR must be certified and inverter-based
14. It is intended that this would be treated like the other screens in the initial review process, though it's not clear yet how such an application might be impacted by the other IRP screens (for example, it is unlikely that a system could pass these new network requirements and fail the Short Circuit Current Contribution screen).
15. As with other screens, failing this screen would simply mean that further evaluation is necessary either through Supplemental Review or in an interconnection study.
16. While there were questions raised during Moh's presentation (such as the need for both the 11kVA and 10% of customer minimum criteria), the group seemed quite pleased that PG&E had taken this proactive first step